Caution: DRAFT FORM

This is an advance proof copy of an IRS tax form. It is subject to change and OMB approval before it is officially released. You can check the scheduled release date on our web site (www.irs.gov).

If you have any comments on this draft form, you can submit them to us on our web site. Include the word DRAFT in your response. You may make comments anonymously, or you may include your name and e-mail address or phone number. We will be unable to respond to all comments due to the high volume we receive. However, we will carefully consider each suggestion. So that we can properly consider your comments, please send them to us within 30 days from the date the draft was posted.

Form **8883**(October 2002) Department of the Treasury Internal Revenue Service

Asset Allocation Statement Under Section 338

► Attach to your income tax return.

OMB No. 1545-XXXX

| Par | Filer's Identifying | | | | | | |
|-----------------------|--|--|--|--|--|---------|-----|
| 1a | Name as shown on return | | | 1b Identifying r | umber as shown o | on retu | irn |
| 1c | Check applicable box (See i Old target | instructions): New target | | and timely Form 8023 filed? ne date filed ► | · · · 🗌 Yes | | lo |
| Par | rt II Other Party's Iden | tifying Information | | 7 | | | |
| 2a | Name of other party to the t | transaction | 0 | 2b Other party | s identifying numb | er | |
| | Address (number, street, and | d room or suite no.) | | | | | |
| | City or town, state, and ZIP | code | | | | | |
| Par | rt III Target Identifying | Information | | | | | |
| | | Ta | rget Corporation | n | | | |
| 3a | Name and address of target | corporation | 3b | Employer identification nu | mber | | |
| | , | | 2- | Chata an account of the common | -1! | | |
| | | | 30 | State or country of incorpor | ation | | |
| | | | | | | | |
| _ | | | | | | | |
| Par | rt IV General Information | on | | | | | |
| 4a | Acquisition date | | 4b | What percentage of target | corporation stock | was | |
| | | | | mundacood. | | | |
| | | | | purchased: | | | |
| | | | | (i) During the 12-month acq | | | _ % |
| | | | | (i) During the 12-month acq (ii) On the acquisition date | e? | | _ % |
| | Stock price | 5b Acquisition costs/S | elling costs 5c | (i) During the 12-month acq | |) | |
| | Stock price | | | (i) During the 12-month acq (ii) On the acquisition date | e? |) | |
| 5a \$ | Stock price | 5b Acquisition costs/S | elling costs 5c | (i) During the 12-month acq (ii) On the acquisition date | e? | | % |
| \$ | · | \$ | \$ | (i) During the 12-month acq (ii) On the acquisition date Target liabilities | e? | | |
| | Was the filer listed in Part I, | \$ above, a member of an | \$ affiliated group | (i) During the 12-month acq (ii) On the acquisition date Target liabilities of corporations before the | 5d AGUB/ADSP \$ acquisition date? | Yes | No |
| | · | above, a member of an amember of an affiliated | \$ affiliated group | (i) During the 12-month acq (ii) On the acquisition date Target liabilities of corporations before the | 5d AGUB/ADSP \$ acquisition date? | | No |
| \$ 6 7 | Was the filer listed in Part I, Was the target corporation a | \$ above, a member of an amember of an affiliated any target affiliate: | affiliated group of group before the | (i) During the 12-month acq (ii) On the acquisition date Target liabilities of corporations before the acquisition date? | 5d AGUB/ADSP \$ acquisition date? | Yes | No |
| \$ 6 7 8 | Was the filer listed in Part I, Was the target corporation or a Is the target corporation or a A controlled foreign corporatio A foreign corporation with inc | above, a member of an amember of an affiliated any target affiliate: on? If "No," check here if ome, gain, or loss effectives. | affiliated group of group before the it was a CFC at a vely connected wi | (i) During the 12-month acq (ii) On the acquisition date Target liabilities of corporations before the acquisition date? any time during the preceding the conduct of a trade or | 5d AGUB/ADSP \$ acquisition date? g 5 years ▶□ business within | Yes | No |
| 6 7 8 a b | Was the filer listed in Part I, Was the target corporation or a Is the target corporation or a A controlled foreign corporatio A foreign corporation with ince the United States (including U | above, a member of an amember of an affiliated any target affiliate: on? If "No," check here if ome, gain, or loss effections. S. real property interest | affiliated group of group before the it was a CFC at a vely connected will solution. | (i) During the 12-month acq (ii) On the acquisition date Target liabilities of corporations before the acquisition date? | se? | Yes | No |
| \$ 6 7 8 a b | Was the filer listed in Part I, Was the target corporation of a Is the target corporation or a A controlled foreign corporation A foreign corporation with ince the United States (including U A qualifying foreign target un | above, a member of an amember of an affiliated any target affiliate: on? If "No," check here if ome, gain, or loss effections. S. real property interestanter Regulations sections. | affiliated group of group before the it was a CFC at a vely connected with a sign of the items o | (i) During the 12-month acq (ii) On the acquisition date Target liabilities of corporations before the acquisition date? | 5d AGUB/ADSP \$ acquisition date? | Yes | No |
| \$ 6 7 8 a b c d | Was the filer listed in Part I, Was the target corporation of a Is the target corporation or a A controlled foreign corporation A foreign corporation with ince the United States (including U A qualifying foreign target up A corporation to which section | above, a member of an amember of an affiliated any target affiliate: on? If "No," check here if ome, gain, or loss effections. S. real property interest ander Regulations section on 936 applies?. | affiliated group of group before the it was a CFC at a vely connected with a sign of the interest of the inter | (i) During the 12-month acq (ii) On the acquisition date Target liabilities of corporations before the acquisition date? | 5d AGUB/ADSP \$ acquisition date? g 5 years ▶□ business within | Yes | No |
| \$ 6 7 8 a b c d e | Was the filer listed in Part I, Was the target corporation of a Is the target corporation or a A controlled foreign corporatio A foreign corporation with ince the United States (including U A qualifying foreign target un A corporation to which section A corporation electing under | above, a member of an amember of an affiliated any target affiliate: on? If "No," check here if ome, gain, or loss effections. S. real property interest onder Regulations section on 936 applies? | affiliated group of group before the it was a CFC at a vely connected with s.). 1.338-2(e)(1)(iii) tion 953(d)? | (i) During the 12-month acq (ii) On the acquisition date Target liabilities of corporations before the acquisition date? | s? | Yes | No |
| \$ 6 7 8 a b c d e f | Was the filer listed in Part I, Was the target corporation of a Is the target corporation or a A controlled foreign corporation A foreign corporation with ince the United States (including U A qualifying foreign target up A corporation to which section | above, a member of an amember of an affiliated any target affiliate: on? If "No," check here if ome, gain, or loss effections. S. real property interesting the Regulations section on 936 applies? r section 1504(d) or sectes corporation (DISC)?. | affiliated group of group before the it was a CFC at a vely connected with 1.338-2(e)(1)(iii) 1.338-2(e)(e)(1)(iii) 1.338-2(e)(e)(e)(e)(e)(e)(e)(e)(e)(e)(e)(e)(e)(| (i) During the 12-month acq (ii) On the acquisition date Target liabilities of corporations before the acquisition date? any time during the preceding the conduct of a trade or acquisition date. | se? | Yes | No |

Form 8883 (10-2002) Page **2**

| Part V | Original Statement of | of Assets | Transferred—All | Filers Mus | Complete |
|--------|-----------------------|-----------|----------------------------|------------|----------|
| GI G U | original otatomone o | | 11 a 1 0 1 0 1 1 0 a 7 til | | |

| 9 Assets | Aggregate fair market value (actual amount for Class I) | Allocation of AGUB or ADSP |
|------------------|---|----------------------------|
| Class I | \$ | \$ |
| Class II | \$ | \$ |
| Class III | \$ | \$ |
| Class IV | \$ | \$ |
| Class V | s | \$ |
| Class VI and VII | \$ | \$ |
| Total | \$ | \$ |

Part VI Supplemental Statement of Assets Transferred—Complete if amending an original statement or previously filed supplemental statement because of an increase or decrease in AGUB or ADSP.

Enter the tax year and tax return form number with which the original Form 8023 or 8883 and any supplemental statements were filed.

| 11 Assets | Allocation of sales price as previously reported | Increase or (decrease) | Redetermined allocation of AGUB or ADSP |
|------------------|--|------------------------|---|
| Class I | \$ | \$ | \$ |
| Class II | \$ | \$ | \$ |
| Class III | \$ | \$ | \$ |
| Class IV | \$ | \$ | \$ |
| Class V | \$ | \$ | \$ |
| Class VI and VII | \$ | \$ | \$ |
| Total | \$ | | \$ |

12 Reason(s) for increase or decrease. Attach additional sheets if more space is needed.